

## **Arlington Affordable Housing Trust Action Plan Summary of Revisions and Public Comments**

### **Opportunities for Community Feedback on the Draft Action Plan**

Following a comprehensive summer community engagement process which is described in the Plan, the Arlington Affordable Housing Trust (the Trust) published a draft Five-Year Action Plan (2022-2027) for public review and comment on September 15, 2022. Public comment and discussion was invited in a number of ways.

- A public comment form was available online between September 15 and October 3, 2022;
- A virtual public forum was held on September 21, 2022 to present the draft plan to the public and invite questions and comments;
- Comments were also welcomed by email to the Trust at [ArlingtonAHT@gmail.com](mailto:ArlingtonAHT@gmail.com);
- Emails inviting feedback were sent to Town mailing lists, the Trust's own mailing list, and to many stakeholders who participated in the community engagement process;
- Trustees and volunteers hosted a booth at Town Day on September 17 to raise awareness about the Trust, the Plan, and to invite public comments on the draft;
- A large, 2-sided sign regarding the draft Action Plan was placed in front of Town Hall, advertising the opportunity to comment on the draft Plan - a location highly visible to all residents passing through the Town;
- A meeting of housing stakeholder organizations, including representatives of the Select Board, the Arlington Housing Authority, the Arlington Redevelopment Board, the Zoning Board of Appeals, the Housing Corporation of Arlington and the Affordable Housing Trust was held on September 20, 2022 to receive feedback from key stakeholders;
- A meeting of affordable housing professionals who live in Arlington was held on September 28 to solicit their professional input regarding the draft Action Plan; and
- The Trust's chair presented the draft plan at a meeting of the Arlington Redevelopment Board on October 3, 2022 and received feedback from Board members.

The Trustees are grateful for the community's active engagement in the planning process. All of the feedback received has been thoughtfully considered.

This document summarizes the feedback received and describes material changes made to the draft Action Plan. The responses are organized by salient and/or recurring topics that we heard from the community.

### **Guiding Principles**

Nearly all the feedback received was supportive of the guiding principles in the plan. A few commenters suggested some additional description of the opportunities available to advance climate resiliency in affordable housing, including both new construction and rehab. We have modified this section accordingly, but will also look forward to fleshing this principle out during the implementation period. One commenter thoughtfully pointed out that just creating affordable housing will not necessarily result in greater racial diversity or equity in Arlington. Consistent,

nuanced leadership will be required to meaningfully expand the diversity of our community, including but not limited to deliberate outreach to underrepresented and protected classes.

### **Clarity & Purpose of Plan, Need for Ongoing Public Education**

Most commenters felt that the plan was clear, readable by non-experts, and that it achieved its purpose of explaining the need for affordable housing and clearly setting forth the Trust's initial guiding principles, goals and strategies. That being said, some noted that between the technical nature of affordable housing and the many acronyms used to simplify discussion, the Action Plan could be confusing to a reader new to affordable housing. The Trust understands the need for continuing public information and education, and will work with DPCD and other housing stakeholder organizations on an ongoing basis to build public support for and understanding of the Trust's goals and strategies, through articles, glossaries, case studies, webinars and other initiatives. Some modest edits have been made for clarity, and additional graphics have been added to make some of the Plan's content more accessible. A visual and text summary of the plan has been added as an Appendix, in lieu of an "executive summary," factual and technical corrections have been made where appropriate, and the resolution and readability of the chart describing income limits has been improved.

### **Income Targeting**

Throughout the community engagement process and the comment period on the draft plan, the Trust heard a variety of opinions about who needs help to afford housing in Arlington, and who should be prioritized (or not) in the Action Plan. Some were disappointed that middle income households were not prioritized, and others felt that the Trust's commitment to prioritize very low- and extremely-low income households should go further. One commenter provided thoughtful data highlighting the fact that lower income households suffer much more extreme housing cost burdens than moderate-income households. We have considered all this feedback, and believe the Action Plan strikes an appropriate balance by including income targeting goals but retaining flexibility.

The Plan goes to some length to describe what various income levels mean, and explains that the Trust's bylaw states our purpose in the creation and preservation of housing for people who make a low or moderate income. Accordingly, middle-income housing is not the focus of the Trust (though moderate income units not supported by the Trust might be included in developments that also include low- or moderate-income units funded by the Trust). The Plan does note that the feedback we received suggests that residents are eager for a full range of housing solutions and that there appears to be strong support for a full range of income diversity in Town.

With respect to prioritizing those with the lowest incomes, the Plan balances this goal with financial constraints. The Action Plan explains that additional subsidy is needed to build very low income units, and that ongoing annual subsidy is needed to operate such units. The Trust will need to rely on the AHA or other voucher administrators to make these units financially feasible. Another resident expressed caution about converting mobile vouchers to project-based, because tenants value the ability to take their subsidy with them if they move. This is a fair point, but must be balanced against the community's desire to create housing, here in Arlington, that is affordable to households who make a very low income. To do this, the Trust has to work with the limited state and

federal subsidies that are available. HUD balances these issues by allowing housing authorities to project-base up to 20% of their vouchers.

Some commenters suggested that the Trust should ONLY support units affordable to residents with incomes below a certain level, such as 60% of area median income. More than once the Trust has heard that units with rents set to be affordable to households making 70% to 100% of area median income are not “real” affordable housing. But as many times as we heard that, we heard others saying the Trust needs to do more for moderate income households, who are also struggling to move here or stay here, and the Trust identified a number of situations where the Trust’s guiding principles and goals mean that it needs to retain the full income flexibility included in the Trust’s bylaw. A graphic describing these situations has been added to the Plan.

Financing affordable housing is complex. It is not realistic or productive to think that choosing to create one type of unit means not creating a different one. Every unit affordable at a below market rent is a win for the resident who needs it. The high cost of subsidizing housing means that we must follow the subsidies available— through state and federal subsidy programs and regulations that incent market actors to privately subsidize it. One group in particular—the affordable housing professionals the Trust met with—were concerned that the challenges of creating affordable housing are such that we must retain flexibility to seize opportunity where possible, and to pivot our specific income targets or unit goals

### **Specificity vs. Flexibility**

A few commenters were eager for more details regarding exactly what steps the Trust will take. While the Plan explains the need to leave the Trust flexibility to achieve its goals through a range of actions, Trustees are also eager to move forward with more specific implementation steps, and will continue to share these proposals with the public and to invite feedback.

### **Strategies and Goals**

Overall, we received broad support for the appropriateness of the three strategies set forth in the Plan and for the three 5-Year Goals. Some commenters were happy to see strategies that are focused on preserving existing affordable housing, while others expressed concern that the Trust focus primarily on creating additional affordable housing. Some felt the goal of 100 new affordable homes was too ambitious, others thought it was not ambitious enough. Many pointed out that the Trust will have difficulty meeting the goals of the Action Plan without the active support of many other stakeholders, with quite a few noting that success will hinge on the Town adopting zoning amendments to attract a level of development sufficient to qualify for state and federal financing programs or trigger the Town’s inclusionary zoning bylaw with greater frequency.

The Trust recognizes the need for multiple strategies to achieve its mission. In cases where the steps necessary to create or preserve affordable housing are outside the Trust’s direct scope of work—e.g., regulatory change or how new housing vouchers are handled—the Trust is committed to collaborating with local stakeholders to ensure that resulting regulatory or policy decisions do not inhibit but rather enhance the work of the Trust. Several commenters encouraged the Trust to continue seeking collaboration between housing stakeholder organizations in Town.

Some comments expressed concern about teardowns of small homes, and we received comments both for and against permitting two-family homes as of right throughout Arlington. While these issues are relevant to the affordability of the housing market broadly, the Trust has kept its focus on strategies for creating and preserving homes that are income restricted to households making a low- or moderate income. Finally, one commenter underscored the importance of establishing sustainable revenue sources for the Trust, suggesting that this is the most important of the Trust's goals.

### **Comments Inconsistent with the Trust's Purpose**

A very few comments were received that effectively opposed the purpose of the Trust as constituted. One commenter argued for the plan to propose strategies for creation of "workforce housing," which we presume refers to middle-income housing. While the plan notes that public comment reflects a need for middle income housing solutions, the Trust's bylaw authorizes us specifically to create and preserve low and moderate income housing. Market forces have raised housing prices so dramatically in our region that they are reducing our income diversity and making our community out of reach—especially for home purchasers—to all but high-income buyers. But the Trust does not have the authority, ability or resources to alter these market forces: our focus is specifically on identifying and seizing opportunities to create and preserve low- and moderate income housing.

One commenter stated that "low-income people can move to where they can afford to live." Another felt that the goals of the plan were admirable but should be achieved only by voluntary contributions, not by public funding, zoning change or regulation. On these points, Town Meeting has already voted to form the Trust to address the need for low- and moderate-income housing that voluntary action has failed to address - the Trust will proceed, consistent with their intent, and the vast majority of public feedback received during the preparation of this Plan.

### **Implementation Ideas Worth Exploring**

We asked the public to share additional ideas for the Trust to consider as we turn to implementation, and our commenters did not disappoint. Many of the ideas received throughout the process have been incorporated into the Plan, and others will be more fully considered as the plan is implemented. Following is a sampling of ideas that were shared. The Trustees look forward to exploring these ideas more fully during implementation of the Action Plan, and hope we can count on the continuing creativity and productive brainstorming from and with the public that occurred during and as a result of the various forms of public engagement during the preparation of this plan.

- Research whether we can impose exaction fees (i.e., linkage fees) on small developers and contractors for projects with less than six units, and/or extend or increase the impact of our Inclusionary Zoning bylaw.
- Considering establishing a chapter 40R "starter home" district;
- Explore tax incentives to owners for below-market sales or rents;
- Considering a range of strategies for creating affordable ADUs;

- Consider accommodating the needs of those with disabilities involving sensory differences;
- In lieu of a real estate transfer fee, increase the percentage for the Community Preservation Act (CPA) and dedicate this additional increment of revenue to affordable housing;
- Increase the percentage of current CPA funding that is dedicated to affordable housing;
- Consider relief for elderly, cost-burdened residents, particularly those who are burdened by property tax increases;
- Increase the cap on short term rental fees and/or the local tax on cannabis;
- Explore opportunities by which donors could consider a deed restriction for affordable housing in their estate plans;
- Explore donor tax credits for contributions to the Trust, similar to the Community Investment Tax Credit that benefits community development corporations like the Housing Corporation of Arlington;
- Consider creation of a community land trust to remove the cost of land from housing prices;
- Consider incorporating affordable housing into the renovation of the Fox Library or a mixed-use redevelopment of the Russell Common parking lot;
- Consider steps to reduce or eliminate local preferences and age preferences that are increasingly associated with discriminatory impact;
- Identify more specific, realistic and comprehensive strategies to attract meaningful diversity and disrupt the segregation and inequity caused by the housing policies of the past.
- Consider whether encouraging renovation rather than demolition and new construction is more cost effective path to affordable housing creation;
- Expand on ways to incorporate climate resiliency into affordable housing initiatives, including maintaining green spaces in mixed-use areas, energy efficient building methods, and more;

**Staffing Considerations.** Several commenters, including members of the Affordable Housing Advisory Council and the Arlington Redevelopment Board, noted that the effectiveness of the Plan will depend on there being adequate staff—at the Town and/or at other local housing stakeholder organizations, to carry out the many action steps set forth in the plan. A paragraph to this effect has been added to the Action Plan. In addition to supporting implementation of this Action Plan, a new Town housing position could also provide more housing counseling and process support to current applicants for and residents of affordable housing.